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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KAREN TAPPERT

Defendant.

2:10-CR-286-PMP (GWF)

**UNITED STATES' UNOPPOSED MOTION  
TO CONTINUE THE DATE FOR THE UNITED  
STATES TO RESPOND TO ENTITLE DIRECT'S  
OPPOSITION TO THE UNITED STATES' MOTION  
TO DISMISS ENTITLE'S THIRD-PARTY CLAIM**

The United States of America by and through Daniel G. Bogden, United States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, respectfully moves this Court to grant a thirty-day continuance for the United States to file its reply memorandum to Entitle Direct's Opposition to the United States' Motion To Dismiss the Third-Party claim of Entitle Direct. The United States' Reply Memorandum is due August 13, 2013.

For its grounds, the United States says that the undersigned Assistant United States Attorney, assigned to this case, was outside of the office for two weeks, from July 29 until August 12, 2013, and was unaware of a Court order setting a deadline for filing a reply until his return to the office on August 12<sup>th</sup>.

1 Entitle has filed a comprehensive response which includes a set of exhibits with what  
2 appears to be at least 200 pages of documents. Given the complexity of Entitle's opposition  
3 memorandum and the volume of exhibits presented by Entitle that Government counsel must  
4 review before he can prepare an adequate response, that task cannot be completed in the one  
5 day that Government counsel has left to him since learning of the Government's filing  
6 deadline for its reply memorandum on August 12<sup>th</sup>. Government counsel has spoken to Alan  
7 Doran, Executive Vice-President of Entitle Group, and he has given Government counsel  
8 permission to inform this Court, through this motion, that he consents to this motion.

9 This motion is not submitted solely for the purpose to delay or for any other improper  
10 purpose.

11 WHEREFORE, the United States moves this Court to grant its motion to extend the  
12 time for the United States to file its reply memorandum an additional thirty (30) days; or until  
13 September 4, 2013.

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Likewise, the Government request that this Court correspondingly, set back the hearing date, currently scheduled for September 11, 2013, to a date that is consistent with the granting of the United States motion to continue; viz., after September 13, 2013.

DATED this 13th day of August 2013.

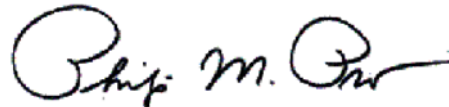
Respectfully submitted,  
DANIEL G. BOGDEN  
United States Attorney

United States reply to Entitle Direct's response to United States' Motion to Dismiss Third-Party Claim is due September 4, 2013.

/s/Michael A. Humphreys  
MICHAEL A. HUMPHREYS

The motion hearing set for 9/4/13 at 10:30 AM is VACATED. Motion hearing re-set to 10/15/13 at 2:30 PM.

IT IS SO ORDERED:



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U.S. District Court Judge

DATED: August 14, 2013

CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing UNITED STATES' UNOPPOSED MOTION TO CONTINUE UNITED STATES' DEADLINE TO FILE A REPLY MEMORANDUM was made by sending a copy of same by first class mail, addressed to the following addressee, on this 14<sup>th</sup> day of August, 2013:

Alan M. Doran  
Executive Vice-President  
Entitle Direct Group, Inc.  
281 Dresser Blvd.  
Stamford, CT 06901

/s/ Ray Southwick